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Attorneys for Defendant

SYNERGY HOMECARE FRANCHISING, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOHN HAN, an individual, ALICE LAI-  
BITKER, an individual, VERIS EASTBAY  
HOMECARE, INC., a California corporation

Plaintiffs,

vs.

SYNERGY HOMECARE FRANCHISING,  
LLC, an Arizona limited liability company,

Defendant.

CASE NO. 4:16-cv-03759-KAW

**STIPULATION AND  
[PROPOSED] ORDER TO  
DISMISS ACTION WITH  
PREJUDICE**

**[Fed. Rule of Civ. Pro. 41(a)(1)]**

TO THE CLERK OF THE COURT AND TO ALL PARTIES AND THEIR  
ATTORNEYS OF RECORD:

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Pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiffs JOHN HAN, ALICE LAI-BITKER and VERIS EASTBAY HOMECARE, INC. through their designated counsel, and Defendant SYNERGY HOMECARE FRANCHISING, LLC through its designated counsel stipulate to dismiss the entire action with prejudice against all parties.

Dated: March 21, 2018

MILESTONE LEGAL, P.C.

By: /s/ Philip Milestone  
Philip Milestone  
Attorneys for Plaintiffs  
JOHN HAN, ALICE LAI-BITKER and VERIS  
EASTBAY HOMECARE,  
INC.

Dated: March 21, 2018

GORDON & REES LLP

By: /s/ Lisa K. Garner  
Calvin E. Davis  
Lisa K. Garner  
Eleanor M. Welke  
Attorneys for Defendant  
SYNERGY HOMECARE  
FRANCHISING, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: 3/22, 2018

Kandis Westmore  
United States Magistrate Judge

**SIGNATURE ATTESTATION**

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: March 21, 2018

GORDON & REES LLP

By: /s/ Lisa K. Garner

Calvin E. Davis  
Lisa K. Garner  
Eleanor M. Welke  
Attorneys for Defendant  
SYNERGY HOMECARE  
FRANCHISING, LLC

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